

U.S. Department of Justice

United States Attorney Eastern District of New York

JN/DKK/LB/CJN F. #2017R05903

271 Cadman Plaza East Brooklyn, New York 11201

September 18, 2020

By Email and ECF

Thomas C. Green Mark D. Hopson Michael Levy Joan M. Loughnane Sidley Austin LLP

David Bitkower Matthew S. Hellman Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's reproduction of an additional 1611 documents in response to your request to downgrade certain documents previously produced as "Sensitive Discovery Material" ("SDM"). The production is being made in accordance with Rule 16 of the Federal Rules of Criminal Procedure and pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The documents listed on the spreadsheet identified as Attachment A to this letter, were previously produced as SDM and are now being reproduced as "Discovery Material" ("DM") under the Protective Order.

¹ For ease of reference, this spreadsheet lists the new Bates number (PRODUCTION BEGDOC (REPROD)) alongside the original Bates number (PRODUCTION BEGDOC).

The government will also reproduce as DM the 2329 documents listed in Attachment B, after redacting personal identifying information and non-relevant customer names.

Very truly yours,

SETH D. DUCHARME Acting United States Attorney

By: <u>/s/ Julia Nestor</u>

Alexander A. Solomon

Julia Nestor David K. Kessler Sarah Evans

Assistant United States Attorneys

(718) 254-7000

DEBORAH L. CONNOR

Chief, Money Laundering and Asset Recovery Section, Criminal Division

U.S. Department of Justice

By: /s/ Christian J. Nauvel

Laura Billings Christian J. Nauvel Trial Attorneys

JAY I. BRATT

Chief, Counterintelligence and Export

Control Section

National Security Division, U.S. Department

of Justice

By: /s/ Thea D. R. Kendler

Thea D. R. Kendler

David Lim Trial Attorneys

cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)